

May 9, 2007

Via Electronic Filing

Sandra J. Paske
Secretary to the Commission
Public Service Commission of Wisconsin
610 North Whitney Way
Madison, Wisconsin 53707

Re: Investigation of Area Code Relief for the 715 Area Code in
Northern Wisconsin
Case No. 05-TN-100

Dear Ms. Paske:

NeuStar, Inc. ("NeuStar"), as the North American Numbering Plan Administrator ("NANPA"), provides an update on the projected exhaust of the 715 numbering plan area ("NPA") and the projected lives of the NPA relief alternatives previously described in the above-referenced proceeding. This information is submitted to assist the Commission in its consideration of the relief plan that should be used to introduce a new area code in Northern Wisconsin.

Background

On August 12, 2002, NANPA, in its role as the neutral third party NPA relief planner for Wisconsin and on behalf of the Wisconsin telecommunications industry ("Industry"), petitioned the Commission to implement relief for the 715 NPA, which at that time was projected to exhaust during the second quarter of 2005.¹ As explained in the Petition, the Industry reached consensus to recommend to the Commission an all-services distributed overlay (identified in the Petition as Alternative #1) as its first choice for relief for the 715 NPA, and a north-to-south geographic split (identified in the Petition as Alternative #6) in the event the Commission rejects the overlay.

Conservation measures and more efficient mechanisms for allocating numbering resources subsequently were implemented, thus decreasing the demand for numbering resources

¹ See Petition of the North American Numbering Plan Administrator, on Behalf of the Wisconsin Telecommunications Industry, for Approval of NPA Relief Plan for the 715 NPA, Case No. 05TN-100 (filed Aug. 12, 2002) ("Petition"). As a neutral third party administrator, NANPA has no independent view as to the relief plan ultimately adopted by the Commission.

in the 715 NPA. Accordingly, the projected life of the 715 NPA was extended for several years and there was no immediate need for Commission action on the Petition.

By a letter dated January 29, 2007, NANPA notified the Commission that numbering resources in the 715 NPA had decreased such that the Commission should further consider the relief alternatives and recommendations set forth in the Petition, and stated that NANPA would update the record accordingly after it released newly calculated projected NPA exhaust information.²

Updated Information

On April 26, 2007, NANPA released its April 2007 Number Resource Utilization Forecast) and NPA Exhaust Analysis (“NRUF Report”) providing projected exhaust dates for all United States NPAs based upon recent central office code (often referred to as “CO” or “NXX” code) demand forecasts and utilization information supplied by service providers.³ Pursuant to the April 2007 NRUF Report, the 715 NPA is now projected to exhaust in the **fourth quarter of 2009**. As of April 30, 2007, 92 CO codes in the 715 NPA are available for assignment.

In addition, the following table sets forth the projected lives of the NPA relief alternatives as originally calculated in the Petition and as recalculated in May 2007 using current Local Exchange Routing Guide data and current demand projection data supplied by service providers.

	Type of Relief	Original Projected Lives	Updated Projected Lives (May 2007)
Alternative #1	All-Services Overlay	12 Years	22 Years
Alternative #2	Geographic Split	Area A: 9 Years Area B: 17 Years	Area A: 21 Years Area B: 23 Years
Alternative #3	Geographic Split	Area A: 10 Years Area B: 16 Years	Area A: 14 Years Area B: 34 Years
Alternative #4	Geographic Split	Area A: 10 Years Area B: 16 Years	Area A: 17 Years Area B: 27 Years
Alternative #5	Geographic Split	Area A: 11 Years Area B: 14 Years	Area A: 19 Years Area B: 25 Years
Alternative #6	Geographic Split	Area A: 9 Years Area B: 18 Years	Area A: 19 Years Area B: 24 Years

² See Letter from Joseph R. Cocke, Senior Relief Planner, NANPA, to Gary Evenson, Telecommunications Division, Public Service Commission of Wisconsin, Case No. 05-TN-100 (Jan. 29, 2007).

³ April 2007 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis (“NRUF Report”), available at http://www.nanpa.com/reports/reports_nruf.html.

As the table demonstrates, the projected lives of each alternative have been extended as compared to the projected lives originally set forth in the Petition. This is due to the reduced demand for CO codes and various number conservation measures. For example, thousand block number pooling was implemented in the 715 NPA on August 6, 2003. Carriers also must meet certain utilization thresholds before they can receive additional numbering resources in a given rate center. In addition, 60 previously “unavailable” protected and special use NXX codes were made available for assignment in January 2003. For the Commission’s convenience, updated maps depicting the NPA relief alternatives originally set forth in the Petition also are attached.

It should be noted that the recalculation of the projected lives of the relief alternatives for the 715 NPA resulted in a difference of 20 years between the updated lives of Area A and Area B for Alternative #3. According to the industry guidelines to which NANPA adheres for relief planning purposes, severe imbalances of more than ten years in NPA lifetimes are to be avoided.⁴ If the Commission chooses Alternative #3 as the method for relief in this case, NANPA is required to notify the Federal Communications Commission so that it may take any action it deems necessary.

If you have any questions regarding this matter, please contact Joseph R. Cocke, Senior NPA Relief Planner, at 805-520-1945 or joe.cocke@neustar.biz.

Respectfully submitted,

/s/ Jordan Goldstein

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cc: All 715 NPA Code Holders and Other Industry Members
Gary Evenson, Administrator, Telecommunications Division
Kathleen Bakke, Commission Staff

⁴ See NPA Code Relief Planning and Notification Guidelines, § 5.0(g), (ATIS-0300061, Jan. 19, 2007) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at www.atis.org/docstore/default.aspx.